

Exhibit F

MONTEREY COUNTY

RESOURCE MANAGEMENT AGENCY



PLANNING DEPARTMENT, Mike Novo, Interim Director

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October 27, 2006

Kate Mckenna, Executive Director
Monterey County Local Agency Formation Commission
P.O. Box 1369
Salinas, CA 93901

SUBJECT: Proposal from the City of Greenfield (LAFCO File 06-10)

Dear Ms. Mckenna:

The Monterey County Resource Management Agency (RMA) has compiled updated comments from the County's land use agencies regarding the proposal from the City of Greenfield to expand their Sphere of Influence. Below are comments from the Agricultural Commissioner, Planning Department, Public Works Department, Health Department, Parks Department and Office of Emergency Services regarding LAFCO File 06-10.

General Comments

In general, there is concern that the SOI is concentric in nature, spreading all sides of the City and north/south along the Highway 101 corridor. As the City is surrounded by prime agricultural land, the SOI takes this valuable land out of production. LAFCO is urged to look at a more directional growth pattern for the City and one that protects agricultural land and prevents growth from spreading along the Highway 101 corridor.

Agricultural Commissioner

The Agricultural Commissioner noted that the City has proposed policies for a 200' buffer in residential areas that adjoin agricultural operations. The City has also proposed to use industrial and ag/visitor serving areas as buffers or transitions to agriculture.

Planning Department

- Any new development adjacent to agricultural areas should include well-defined buffer zones as set forth in Section 21.66.030.F.2 of the County Zoning Ordinance (Title 21). The areas to be utilized as buffer zones shall be placed in easements required as conditions of project approval. For development adjacent to "F", PG" or "RG" zoning districts, the easement shall be a width of 200 feet or wider where necessary to mitigate adverse impacts between agricultural and adjacent land uses.

- There needs to be a quantifying of the financial loss to the County/region from the conversion of agricultural to the proposed uses, including a discussion of how the agricultural jobs that will be replaced will compare to those created.
- Most of the amended SOI contains approximately 1,300 acres of prime agricultural land. What are the alternatives to converting this amount of prime agricultural land or alternatively how the City will provide for permanent protection of prime ag land elsewhere in the County prior to proceeding with the proposed development?

Public Works Department

- Because of the extent of the potential development in these areas, the County is concerned about the impacts this proposal will have on our existing facilities and resources. The County understands that developments in these areas would likely utilize both County and City public service resources and facilities. The County recommends the City coordinate with the appropriate agencies and County departments when planning and designing public service facilities to ensure acceptable service is provided to the community.
- Because existing County street facilities are potential direct access routes to the proposed SOI areas, the County is very interested in the development within the proposed SOI. As development occurs, County roadways, including, but not limited to, Thorne Road, Walnut Avenue, Elm Avenue and Espinosa Road will be directly impacted by traffic generated by the new growth areas. Impacts to the City and County roadway systems must be determined, and any mitigations identified within the unincorporated portions of the County need to be developed in consultation with the County as well as TAMC and Caltrans. As responsible agencies, each needs to have the opportunities to consult on the scope of the mitigations proposed for the County or State roadway systems.
- The County is very interested in the phasing of the development within the proposed SOI. As development progresses, our agencies must coordinate and implement projects, roadway improvements and mitigations as the region develops to ensure facilities will be sufficient to accommodate the additional demands associated with the growth of the community. The County is available to provide input during the review process of development proposals and roadway facility improvement projects in these areas, and requests the City coordinate with the County of Monterey and all other affected agencies to implement improvements that would affect roadways and facilities in the neighboring County vicinities.
- The Preliminary Sphere of Influence Evaluation for the City of Greenfield prepared in late-2005 states that the existing roadway network will not support the range and intensity of the proposed land uses in the preliminary SOI, and an expanded roadway network would be necessary as portions of that SOI are developed. The County is concerned that these SOI proposals would have similar effects to County roadway facilities. The County requests the City work with the County in identifying and developing improvements that address impacts to the neighboring County roadways facilities.

- As development occurs within the proposed SOI, County roadways will be directly impacted by traffic generated from the new growth areas. Impacts to the City and County roadway systems have been identified in the traffic study for the Draft EIR (DEIR) for the City of Greenfield "South End SOI and GPA Project" – Proposed Land Annexation to the City of Greenfield, and implementation of mitigations identified within the unincorporated portions of the County need to be coordinated with the County, and Caltrans, if State facilities are affected. As responsible agencies, each needs to have the opportunities to consult on the scope of the mitigations proposed for the County or State roadway systems.
- The DEIR identifies a proposed extension of 3rd Street from Elm Avenue to Espinosa Road, presently a county road. This proposed road extension would provide direct access to the project site. New roadways in this vicinity will affect traffic circulation in the area, and including these roadways will help identify potential impacts which will require mitigation. The County supports the DEIR traffic study's recommendation of incorporating this roadway extension in the road network planning in this area.
- The DEIR and traffic study identify direct project impacts at the intersection of the US 101 northbound on/off-ramp / Espinosa Road overpass / Patricia Lane, and proposes the signalization of the intersection to mitigate those impacts. Because this intersection includes Caltrans and County roadway facilities, implementation of this mitigation must be coordinated with Caltrans and Monterey County.
- The DEIR identifies impacts at on/off ramps along US 101 at Espinosa Road. As mitigation for these project impacts, the DEIR identifies a new highway interchange at US 101/Espinosa Road, to be funded through the City's traffic impact fee. Improvements affecting state highway facilities must be coordinated with Caltrans, and a Project Study Report would likely be required. The DEIR and traffic study indicate that this interchange project would also require relocating highway on/off-ramps to existing County roadways, and realigning nearby County roads. All improvement projects affecting County facilities must be coordinated with Monterey County.
- The proposed SOI includes the previously proposed Southern Addition at the southeast City limits. Because the proposed land use includes Commercial Industrial uses, there is the potential for increased vehicle and truck traffic to and from this area. Several County roadways in this vicinity, including Espinosa Road, provide direct access to this area, and any impacts to County roadways must be considered and addressed. A thorough pavement condition analysis shall be conducted and corresponding mitigation measures developed, should the project generate a significant amount of heavy truck traffic on County roads, i.e. increases in the Traffic Index (TI).
- County records identify an adopted plan line for 12th Street from Elm Avenue to Cypress Avenue, along a portion of the westerly boundary of the proposed SOI (Official Plan Line maps, Vol. 2 OPL Pg. 54, Sheet 3). Because the plan line lies along the SOI boundary, if this roadway is annexed into the City, this plan line must also be taken into consideration. If

- the plan line is not consistent with the City of Greenfield's General Plan and needs to be amended or removed (this takes Board Action per Ordinance No. 499), the project applicant must request to have this plan line removed or revised, and the ordinance has to be amended prior to any project approvals.
- Any mitigation measures proposed by the project should conform with regional planning documents, such as the Monterey County General Plan and TAMC's Regional Transportation Plan.
- To address cumulative regional transportation impacts of development within the proposed SOI project, the City is encouraged to utilize the Transportation Agency for Monterey County (TAMC) Regional Impact Fee to generate funds which may be applied towards regional transportation projects. Monterey County supports the City of Greenfield's recent action of adopting a notice of intent to establish a regional development impact fee in the City of Greenfield.
- In the areas of the proposed project/SOI, there are no CSAs (County Service Areas) that would be affected or impacted by this proposal.

Health Department

- The City has been updating its Capital Improvement Plans for water and sewer service on a parallel track with the General Plan. Phased expansion of these systems is currently permitted and underway, and the City has updated its impact fees to address the cost of these systems over time. Further, the General Plan states it is the responsibility of new development to provide infrastructure directly or pay appropriate fees for those services be provided.
- The existing monthly average and peak treatment volume of the wastewater system is 0.87 MGD and 1.42 MGD, respectively. The City of Greenfield has been approved for a waste discharge permit to increase treatment capacity of its current maximum average monthly treatment volume from 1.0 MGD to 2.0 MGD. Phase one of this construction is underway. In order to provide adequate domestic water supply a new well must be constructed to augment the existing supply wells.
- The MCHD supports a planning process that will enable permitted capacity for development as it is constructed. Expansion of the water and wastewater facilities should be permitted, and secured by development impact fees and other adopted fee programs as early in the review process as possible. It is recommended that the expansion of the water and wastewater facilities be constructed prior to the issuance of building permits for any project.

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Parks Department

The Parks Department noted that, pursuant to the Quimby Act, a sufficient amount of parkland is planned for the residential build-out of the proposed SOL.

Office of Emergency Services

The Office of Emergency Services stated they did not have any objection to the proposal as presented.

If you have any questions or need additional information, please feel free to contact me at (831) 755-5183 or schubertbj@co.monterey.ca.us.

Sincerely,



Bob Schubert, AICP
Acting Building and Planning Services Manager

Cc: Thom McCue
Wayne Tanda
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